

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

STEPHEN SULLIVAN, WHITE OAK FUND LP,  
CALIFORNIA STATE TEACHERS'  
RETIREMENT SYSTEM, SONTERRA CAPITAL  
MASTER FUND, LTD., FRONTPOINT  
PARTNERS TRADING FUND, L.P., AND  
FRONTPOINT AUSTRALIAN OPPORTUNITIES  
TRUST on behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

BARCLAYS PLC, BARCLAYS BANK PLC,  
BARCLAYS CAPITAL INC., BNP PARIBAS  
S.A., CITIGROUP, INC., CITIBANK, N.A.,  
COÖPERATIEVE CENTRALE RAIFFEISEN-  
BOERENLEENBANK B.A., CRÉDIT AGRICOLE  
S.A., CRÉDIT AGRICOLE CIB, DEUTSCHE  
BANK AG, DB GROUP SERVICES UK  
LIMITED, HSBC HOLDINGS PLC, HSBC BANK  
PLC, ICAP PLC, ICAP EUROPE LIMITED, J.P.  
MORGAN CHASE & CO., JPMORGAN CHASE  
BANK, N.A., THE ROYAL BANK OF  
SCOTLAND PLC, SOCIÉTÉ GÉNÉRALE SA,  
UBS AG AND JOHN DOE NOS. 1-50,

Defendants.

No. 13-cv-02811 (PKC)

**SUPPLEMENTAL DECLARATION  
OF RICHARD BIGWOOD ON  
BEHALF OF ICAP EUROPE LTD.  
IN SUPPORT OF FOREIGN  
DEFENDANTS' MOTION TO  
DISMISS FOR LACK OF  
PERSONAL JURISDICTION**

I, Richard Bigwood, declare under penalty of perjury as follows:

1. I am Executive Managing Director Rates, EMEA for ICAP Europe Ltd. ("IEL") in London, United Kingdom.

2. I submit this Declaration on behalf of IEL in support of Foreign Defendants' Motion to Dismiss for Lack of Personal Jurisdiction. This Declaration is based upon my personal knowledge and is true and correct to the best of my knowledge and belief.

3. Plaintiffs' assertion on page 7 of their Memorandum of Law in Opposition to Defendants' Motion to Dismiss for Lack of Personal Jurisdiction that "ICAP" is a clearing member on the Chicago Mercantile Exchange ("CME") is incorrect. IEL is not a clearing member of the CME.

4. I, Richard Bigwood, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

Executed in London, United Kingdom on December 18, 2015.

  
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Richard Bigwood